

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : NO. 3:CR-14  
:   
v. : (JUDGE )  
:   
JOHN YUKNAVICH, : (ELECTRONICALLY FILED)  
Defendant :

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

At all times pertinent to this Information:

1. The defendant, **JOHN YUKNAVICH**, was the Chief and President of the Wilkes-Barre Township Volunteer Fire Department, a fire service organization composed of volunteers who perform fire suppression and other related emergency services for the citizens of Wilkes-Barre Township, Luzerne County, Pennsylvania.

2. Luzerne County, Pennsylvania is a local government.

3. Luzerne County and Wilkes-Barre Township each received federal assistance in excess of \$10,000 during each of the one-year periods beginning January 2008 through December 2011.

4. Pursuant to his position as Chief and President of the Wilkes-Barre Township Volunteer Fire Department, **JOHN YUKNAVICH** was responsible for the receipt of funds from Wilkes-Barre Township on behalf of the fire department, as well as all other funds received either through charitable contributions or annual state aid received from the Commonwealth of Pennsylvania. **JOHN YUKNAVICH** was responsible for ensuring the deposit of the collected funds into a bank account maintained by the volunteer fire department, and the use of those funds for fire department purposes only.

5. From 2008 through 2011, Wilkes-Barre Township provided monthly checks to the fire department in the amount of \$3500. The intended purpose of the funds was to assist the fire department in payment of its mortgage, as well as other bills incurred in the daily operation of the fire department.

6. Between January 2008 through December 2011, **JOHN YUKNAVICH**, in the course of his duties as Chief and President of the Wilkes-Barre Township Volunteer Fire Department,

embezzled, stole, obtained by fraud and otherwise without authority, and knowingly converted property valued at \$5,000 and more for his benefit from the fire department, Wilkes-Barre Township, and the citizens of the Commonwealth of Pennsylvania.

7. **JOHN YUKNAVICH** was able to execute his scheme to embezzle, steal and obtain property by fraud by reason of his having control over the funds and the bank accounts relating to the fire department. When **JOHN YUKNAVICH** personally received the monthly checks from Wilkes-Barre Township, he would deposit only a portion of the \$3500 check and would take the remainder of the check in cash for his personal benefit.

COUNT ONE

18 U.S.C. § 666(a)(1)(A)

(Theft Concerning Programs Receiving Federal Funds)

8. The United States Attorney hereby incorporates by reference, as though fully set forth herein, each of the allegations set forth in paragraphs 1 through 7 of this Information.

9. Between on or about January 2008 through December 2011, in Luzerne County, Pennsylvania and within the Middle District of

Pennsylvania, the defendant

**JOHN YUKNAVICH**

did knowingly embezzle, steal, obtain by fraud, and otherwise without authority, and knowingly converted and intentionally misapplied property valued at \$5,000 and more, which was owned by and under the care and control of the Wilkes-Barre Township Volunteer Fire Department, Wilkes-Barre Township, Luzerne County, and the citizens of the Commonwealth of Pennsylvania.

In violation of Title 18, United States Code, § 666(a)(1)(A).

Aug 27, 2014  
DATE

Peter J. Smith  
PETER J. SMITH  
UNITED STATES ATTORNEY